

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

No. S1 16 Cr. 776 (VEC)

JOSEPH PERCOCO,
a/k/a "Herb,"
ALAIN KALOYEROS,
a/k/a "Dr. K.,"
PETER GALBRAITH KELLY, JR.,
a/k/a "Braith,"
STEVEN AIELLO,
JOSEPH GERARDI,
LOUIS CIMINELLI,
MICHAEL LAIPPLE, and
KEVIN SCHULER,

Defendants.

**Declaration of Barry A. Bohrer in Support of
Motion for *Brady* Disclosure**

I, BARRY A. BOHRER, hereby affirm as follows:

1. I am a member of the bar of this Court and a partner at Schulte Roth & Zabel LLP ("SRZ"), attorneys for defendant Joseph Percoco. I make this Declaration, based on firsthand knowledge, in support of Mr. Percoco's motion for *Brady* disclosure.
2. Attached hereto as Exhibit 1 is a true and correct copy of a redline provided by the government on May 12, 2017, reflecting changes between the Indictment and the Superseding Indictment.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 19, 2017

By: /s Barry A. Bohrer
Barry A. Bohrer